LAW OFFICES OF LONNIE HART JR. P.C.

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March 16, 2023

The Honorable Paul G. Gardephe Chief United States District Judge Southern District of New York 500 Pearl Street New York, New York 10007

Re: United States v. Johnny Damus, et al., 22 Cr. 514 (PGG)

Dear Judge Gardephe:

I write to you as counsel for Jonathan Persaud, a co-defendant in the above captioned case currently pending before your Honor. I request that my client Mr. Persaud be released from electronic monitoring as well as his curfew.

Mr. Persaud had these restrictions placed upon him since his arrest back on September 29, 2022. Since then, Mr. Persaud has been in full compliance with any and all directives from pre trial services.

I have spoken with Mr. Persaud's pre-trial officer, Christina Venable, and she has agreed Mr. Persaud should be released from electronic monitoring as well as his curfew.

I have also spoken with AUSA Nicolas and she has no objection to the change if the court allows it.

Please let me know if you have any questions or concerns.

Respectfully Submitted,

Lonnie Hart Jr. Esq

(LH 3560)

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MEMO ENDORSED

The Application is granted.

SO ORDERED:

Paul G. Gardephe, U.S.D.J.

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Date: March 28, 2023